



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING
ADVISORY COMMITTEE

Welsh Assembly Government

16 July 2009

Dear Sir or Madam,

Consultation Response – Towards Zero Waste – One Wales One Planet

I am writing to present the LARAC response to the new Waste Strategy for Wales Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overall LARAC supports the long-term aim for One Wales, One Planet, and the proposed strategy with use of sector plans. It would however like to see more emphasis on waste reduction and reuse, in addition to further recycling initiatives. Overleaf are our detailed comments as requested in the consultation.

If you have any queries on this response or would like to discuss the matter further then please contact me on 01786 850326 or khelwig@dsl.pipex.com.

Yours faithfully,

Karin Helwig
Policy Support Officer
LARAC Policy Team



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Consultation Response – Towards Zero Waste – One Wales, One Planet

Commitment to goals

Q1. Do you support the strategy's 'zero waste' approach with a long-term aim of zero waste and 'one Wales: one planet' by 2050 and a medium-term aim of 70% recycling across all sectors by 2025?

LARAC supports the strategy's Zero Waste approach and its aim for 'one Wales, one planet'. High recycling levels would contribute to these aims, but more emphasis is needed on reducing waste and also reducing consumption.

Q2. Do you support the development of sector plans? Are there other sectors that need to be covered? Sector plans will be the main delivery documents for implementing this high level strategy, and will be subject to a separate consultation exercise. If you would like to be consulted on any sector plans please supply us with your contact details.

LARAC supports the developments of sector plans provided that cross-sector opportunities are fully exploited. Cross-sector communication, as well as intervention or mediation by WAG is essential for this purpose. Economies of scale, in particular for materials recycling, cannot always be achieved within the sector, and WAG will have to ensure there is enough alignment between sectors to address this. LARAC does believe that where reuse is concerned, e.g. through repairing and upgrading products and increasing their lifespan, a sector-based approach may be very beneficial. and would therefore also support sector-specific targets for the reduction or recycling of waste. Furthermore, where appropriate, sector-specific targets should be considered for procurement of recycled source materials, in particular for those materials that can be recycled locally, in order to stimulate market development for recycle,.

Where developing the sector plan for municipal waste, it may be beneficial to distinguish between the following 3 categories: domestic waste, commercial waste that is collected by Local Authorities, and Local Authorities' corporate waste. These 3 categories are each produced by different groups (individuals, businesses and the Las) and only have in common that they are all collected by Local Authorities. It may not make sense to make Local Authorities responsible for the achievement of targets for all 3, although they clearly have at least a facilitating role. Whereas significant opportunities for improvement still exist, it must be acknowledged that significant progress in the recycling figures for domestic waste has already been achieved over the past decade or so. In this light, it questions whether municipal waste as a whole should be the first priority sector.

Q3. Do you support the aim of maximising the social, economic and environmental outcomes (sustainable development) through delivery of the strategy? Are you happy with the headline indicators?

Typo: "Waste arisings, disposal and across all sectors".



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Elements included in this indicator should not just be based on tonnages arisen/disposed/recycled, but also on the environmental effects of recycling and disposal processes such as carbon benefits through compost use, or energy gain through AD or EfW.

LARAC would also note that 'resource use' is not just an economic indicator but also one of sustainability, e.g. through green procurement. The same goes for 'resource efficiency' and 'energy from renewable sources'. It is important to note that economic benefits can go hand in hand with sustainability.

LARAC would suggest WEEE might be included as a priority material, for the following reasons: it scores high in terms of hazardousness per weight, and much can be done to reduce this waste

Waste reduction

Q4. Massive levels of waste reduction are needed to achieve zero waste and 'one Wales: one planet' levels by 2050. What can the Assembly do to help your sector achieve the waste reduction targets set?

WAG will need to examine what policy instruments and legislation it can introduce on producers of waste, such as retailers and individual households if it to achieve the aspiration of one planet living. It is also likely that WAG will have to introduce compulsory targets across all sectors if the levels of waste reduction and recycling needed are to be achieved. This will have to be backed up by compulsory data collection across all waste streams to mirror Waste Data Flow (WDF) for the municipal sector. By using WDF the municipal sector now has confidence in the amount of waste it is dealing with and so can plan infrastructure better and be confident about tracking trends.

Local authorities can only do so much in terms of behavioural change and so WAG must take a national lead on getting individuals to reduce and change consumption habits in a way that then reduces waste production. This means a huge investment in organisations such as Waste Awareness Wales (WAW) which should be seen as the 'infrastructure' needed for waste minimisation. Given the knowledge and expertise that already exists within WRAP on waste communications it is felt that WAW should be closely linked, if not part of, WRAP in order for their work to have most impact.

Further information is needed on Life Cycle Analysis (LCA) studies to highlight at what stage in a products life the most environmental damage is done. It could be that the waste industry needs to change its process to be able to recycle new materials that are better used in packaging because of their light weighting properties.

The target of 150kg/household would seem an appropriate level to set. However local authorities are not the place this target should be placed on, even if they have the systems to measure progress against it. WAG need to find a way of giving the individual household this target so that they then take ownership of the problem we are facing and become an integral part of the solution.



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Q5. Commercial and industrial: Your views are sought on which option to use as a basis for waste reduction targets and why.

LARAC would like to see more detail on the level and type of recycling services Local Authorities would be expected to provide for the commercial sector, in terms of both collection and disposal facilities.

Q6. Municipal: Your views are sought on which option to use as a basis for waste reduction targets and why.

We feel that option 1 is the better option as this should allow actions to be taken in the short/medium term that then put the tools in place to achieve the targets in the long term. That then does really on this action being taken rather than purely focussing on the targets in the short term otherwise the long term targets will not be hit.

However, although Local Authorities collect municipal waste, it must be understood that residents and businesses contribute to the production of municipal waste. Ensuring residents and businesses reduce their waste is not just the responsibility of Local Authorities but also of WAG, householders, retailers and manufacturers. Significant resources must be available to educate and encourage these groups to reduce their waste. Local Authorities' responsibility for the reduction of municipal waste must be clearly delineated and justified, and where Local Authorities are responsible for educating residents and businesses they must be given the tools and resources to do so.

Q7. Reuse target: This reuse target will be predominantly achieved through the reuse of furniture. Your views are sought on whether this target should be higher. If so what other materials could be reused to achieve the higher target?

Successful reuse schemes for paint are operational. Textiles can also be reused relatively easily through well-established charity shop networks. There are other opportunities that will perhaps yield a smaller contribution in tonnage, but will nevertheless help engender a culture of reuse: these include e.g. toys and books.

Furthermore, efforts should be made to address the lifespan of other types of products. Education and support services (e.g. IT upgrade support for householders, repair networks for electrical goods).

Q8. Construction and demolition. Your views are sought on which option to use as a basis for waste reduction targets and why.

LARAC has no comment on this issue.

Recycling



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Q9. Commercial and industrial: Which recycling rate is feasible (70% or 77%) and why?

LARAC would suggest that it would be better at this point to have separate targets for the commercial and industrial sectors.

Q10. Municipal: Are the targets set for municipal waste recycling and landfill diversion correct?

A 70% recycling target is unlikely to be achieved with the current national policy instruments in place. It will require a joint approach from local authorities and WAG to put in place the systems needed to achieve this high level of recycling. The background work undertaken in 'Future Directions' also assumed a change in waste composition that would make this target achievable, but this was not backed up with evidence and so is an assumption at present not a given. The targets should also have some flexibility to allow for regional circumstances where for example, there is the possibility of slightly higher levels of energy production from waste than others. It should be clarified which forms of Energy from Waste are included in the maximum of 30%, in particular whether AD is included or not.

Q11. Construction and demolition: Is a 90% target for recycling, recovery and reuse of non-hazardous waste achievable?

LARAC does not feel qualified to answer this question.

Waste infrastructure

Q12. Does the strategy provide the clarity needed (particularly by industry and the public sector) to allow investment in the relevant waste infrastructure?

Sector plans will hopefully provide more detail on what infrastructure is required. It must be born in mind that this is a two-way process, and that the availability of infrastructure can act as a stimulant for producers of waste to separate out that fraction for which there is an accessible buyer.

Although more waste infrastructure is undoubtedly needed it does put the focus at the 'end of pipe'. Whilst the strategy does provide clarity in terms of recycling and treatment it again draws the focus to the final part of the chain when the waste has already been produced. There is a danger that the infrastructure for the situation now is put in place and then waste minimisation and product design changes mean that the infrastructure is no longer needed in that particular form. There is a lack of clarity about the 'infrastructure' needed for reuse, waste minimisation and behaviour change which WAG itself has stated will have the greater impact in getting to one planet living.

Q13. Would you like additional waste facilities/ services in your area/ sector to provide opportunities for local jobs and support the Welsh economy? What facilities/ services would you like to see?



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Ideally it would be preferable to see jobs created that are associated with the upper part of the waste hierarchy, i.e. reduction and repair, rather than creating a recycling industry that needs the material to feed it.

Again jobs associated with product design and materials technology would be a more benefit than jobs in the waste sector in terms of achieving the aims of the strategy.

Roles & responsibilities

Q14. What role can you/ your organisation play in helping deliver this strategy? What more can the Assembly do?

Local authorities have a huge role to play in helping to deliver the strategy. However to do that there needs to be a certain amount of freedom and flexibility for them to innovate and adapt to local circumstances if the pace of change needed is to be achieved.

LARAC may be able to contribute to the development of the municipal sector plan, as it represents the vast majority of Local Authorities.

WAG has a big leadership role to play and must be prepared to take tough decisions and introduce legislation if it is needed to ensure that all stakeholders are working towards the overall goals. In the past requirements and legislation has been placed on local authorities more so than private industry where an over reliance on 'voluntary' agreements seems to be the norm.

Q15. Given the scale of the challenge, what practical ideas/solutions can you suggest that would help achieve zero waste and 'one Wales: one planet' levels by 2050?

Culture change and behaviour change away from consumption and disposal is vital. To achieve this in an economically sustainable manner, the decoupling of economic growth and waste growth needs to be furthered urgently, a new appreciation of quality, longer lived products should be nurtured, and the social pressure to consume needs to be reduced. Reduce and reuse behaviour must become mainstream, much like recycling has become mainstream.

As with recycling, a combination of communication and education, and where appropriate enforcement, with the provision of convenient, accessible infrastructure (e.g. to repair or IT upgrade services) will be necessary. It must be acknowledged that a certain amount of attention in the national media about the environmental effects of waste have contributed to the public awareness or waste issues. Similarly, the environmental effects of unbridled consumption of short-lived products must be emphasized to the public whilst alternative choices are promoted.